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The URISA Board of Directors has reviewed the draft *Guidelines for Procurement of Professional Aerial Imagery, Photogrammetry, Lidar, and Related Remote Sensor-based Geospatial Mapping Services*, as published by ASPRS, and offers the following comments organized by topic.

1. QBS Is Not the Only -- Nor Always the Best -- Alternative to Low-bid Procurement. The guidelines recommend that "Brooks Act QBS or similar methods be used for procurement of all professional geospatial mapping services" (Sec. VIII, second paragraph). The guidelines mention none of the limitations of QBS, nor do they mention other procurement source selection methods that are more widely used in the profession, nor do they offer any reason why QBS would be superior to all other methods for all professional service procurements. The URISA Board agrees that a typical low-bid process is best suited for procurement of well-defined products and is not advisable for professional services. However, the Board believes the guidelines would better serve the public by providing an unbiased evaluation of the full range of current practices.

QBS can be useful when a product or service cannot be specified clearly. However, work product specifications and quality standards are well defined for many mapping products and services, and clients have many means of access to independent expertise needed to use and interpret those specifications and standards intelligently. QBS removes cost as a significant selection criterion--but cost is and ought to be an important factor in most procurements, especially publicly-funded procurements. Finally, QBS precludes fair comparisons between different approaches and firms, even though comparisons can be essential to an informed client decision, and they foster innovation among producers.

For these reasons, best-value methods and lowest technically accepted source selection methods are more commonly used for geospatial professional services procurement. The *Federal Acquisition Regulation* (FAR), Subpart 15.1, lists a number of best-value continuum methods for reaching a negotiated contract for mapping products. The method previously endorsed by URISA in its Quick Study Guide, *GIS Procurement and RFP Development*, involves the trade-off process, which allows consideration of price and technical specifications resulting in a procurement that balances these aspects of vendor proposals according to the nature of the end product and its intended use. Another procurement method that likely has extensive application in spatial data acquisitions is the lowest technically accepted source selection process, which sets a technical threshold above which proposals can be evaluated by price. It may be useful for the committee to review prior published procurement guidelines to learn more about existing practices.

The URISA Board strongly urges the committee to describe all of these procurement methods in the next draft of the *Guidelines,* to offer unbiased guidance on the advantages and limits of each, and to recommend none as "best" but to encourage clients to select the method that best suits the conditions and purposes of their procurements.

2.Mapping Services Are Generally Not Related to Architecture and Engineering Services. Some of the entities represented on the drafting committee have sought to classify mapping services, regardless of how they are delivered or by whom, as the licensed practice of surveying. This logic has been extended to say that the "Brooks Act" authorizing a portion of FAR Subpart 36.6 governing the procurement of architecture and engineering services applies to all mapping product procurements. The *Guidelines* continue this line of reasoning and reach the same conclusion. The URISA Board takes strong exception to this conclusion, which is in direct opposition to the stated scope of Subpart 36.6. General mapping is in no way part of the licensed practice of architecture and engineering, nor are related spatial data products that may be delivered by licensed surveyors or photogrammetrists within the scope of Subpart 36.6. In fact, s. 36.601-3(d) of FAR specifically excludes incidental services, like surveying and mapping, from procurement through the procedure defined in Subpart 36.6 when they "do not require performance by a registered or licensed architect or engineer." No state requires that mapping services of any type be provided only by licensed architects or engineers.

3.Geospatial Professionals Increasingly Create Products, Not Services. By restricting its scope to services, the draft guidelines disregard an important trend that is transforming the geospatial professions: the increasing commoditization of geospatial products, and their growing competition with professional services. As geospatial data and technology have become more ubiquitous, products have become increasingly standardized. For example, satellite imagery, road network data, and GPS devices are widely available by internet or as consumer products, along with many other geospatial products that even a few years ago required professional expertise to obtain and use. The guidelines should acknowledge this trend, to preclude the misimpression that all geospatial products are or should be provided by professionals as services.

4.*Guidelines* Need To Address Pre-solicitation Actions. One of the primary omissions of the *Guidelines* is what a consumer of spatial data can do to improve the quality of proposals before the solicitation is issued. Such actions as attending conferences, sending out pre-solicitation notices, issuing requests for information (RFI), and conducting pre-solicitation conferences can educate both the consumer on vendor practices and potential suppliers on what the consumer really needs. Too often, an RFP is issued without sufficient content to tell the potential vendors what is really desired, or the RFP seeks the impossible, such as a firm fixed price for an indeterminate product. As a result, vendors may be uncertain as to what they should propose and fail to respond to the solicitation. Mutual education before the solicitation is issued will go a long way toward improving the end result and can reduce the chance for project delaying protests.

5.Local Governments and Utilities Must Be Included on the Drafting Committee. It is possible that many of the shortcomings identified above are the result of inadequate representation on the drafting committee of the primary consumers of spatial data; i.e., local governments and utilities. It seems logical to include the persons who would be most likely to utilize the *Guidelines* on the committee that drafts the document. At the very least, it would facilitate discussions between suppliers and consumers regarding the needs of both parties in the procurement process.

The URISA Board again wants to thank ASPRS and the drafting committee for undertaking this important work, and for being open to input from other parties as you move forward to complete the effort.